

## DOCKET FILE COPY ORIGINAL

May 28, 2003

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JUN 26 2003

Federal Communications Commission  
Office of the Secretary

The Honorable Michael Peevey, President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Agenda ID 2177, 2179 for Proposed Decisions in R.95-04-043/1.95-04-044

Dear President Peevey:

On behalf of El Segundo Chamber of Commerce President Liz West and our Board of Directors, this communication is to inform you of their unanimous reconfirmation of our opposition to the 310 Area Code Split and strongly urge you to vote AGAINST splitting the 310 area code at your June 5 meeting. Instead, we strongly urge you to approve Commissioner Loretta Lynch's alternate decision.

Over the past several years, the greater Los Angeles area has endured several area code splits, and each one has been both disruptive and negatively impactful to local small businesses that rely on stable telephone numbers as an indispensable point of customer contact. In addition to customer confusion and the resulting loss of sales, each business must spend significant sums for new stationery, advertisement, signage, marketing, and other materials. These costs are especially difficult to shoulder during this current economic climate.

While we applaud the CPUC's recent efforts to conserve numbers, we emphatically believe it is much too early to give up! We understand there are approximately 580,000 telephone numbers remaining in the 310 area code, and that there are additional measures that can be taken to both increase the pool of numbers and slow the rate at which they are exhausted.

If the CPUC closely monitored number use while redoubling its efforts with the Federal Communications Commission to increase the "contamination threshold" for number pooling and enforce wireless local number portability, the life of the 310 area code could be extended for several more years. Furthermore, we strongly urge the CPUC to resubmit its technology-specific overlay petition to the FCC as soon as possible. Creating a special new area code for fax machines, ATMs, and other "non-human" devices could free up even more numbers for individual phone customers.

Finally, we note that while the proposed area code split concerns only the South Bay, the larger issue concerns all California communities. If the CPUC gives up on number conservation too readily, the same disruption will be visited prematurely on thousands of small businesses in dozens more communities around the state over the next several years.

For these reasons, we urge you to reject the proposed 310 split and to approve Commissioner Lynch's alternate decision.

Most sincerely,

Daniel L. Ehrler  
Executive Director

Cc - Federal Communications Commission   Governor Gray Davis  
      Senator Debra Bowen     Assemblyman George Nakano



May 28, 2003

The Honorable Michael K. Powell, Chairman, and Members  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: CC Docket 99-200 and CC Docket No. 96-98 in the matter of:  
Numbering Resource Optimization and Implementation of the Local Competition Provisions of  
the Telecommunications Act of 1996

Dear Chairman Powell and Commissioners:

On behalf of El Segundo Chamber of Commerce President Liz West and our Board of Directors,  
this communication is to inform you of their unanimous approval to oppose portability  
postponement and urge you to oppose it, as well.

This issue has been before the Chamber previously, and the Board's action was a reconfirmation  
of its prior position. The basis of this decision comes from a section of the *ALTERNATE DRAFT  
DECISION OF COMMISSIONER LYNCH*, from the California Public Utilities Commission,  
May 6, 2003, page 19. The following quote directly relates to the heart of our position and  
request:

“...wireless local number portability will help to decrease the demand for new telephone  
numbers in the 310 and other area codes, as customers exercise the option to keep their  
existing telephone number(s) if they switch carriers. Currently, any wireless carrier must  
weigh the benefits of that switch against the time, cost, and inconvenience of accepting a  
new seven-digit telephone number from the new carrier. Once wireless LNP is  
implemented this fall, consumers will have the option to keep, or port, their telephone  
number(s) from wireless carrier to wireless carrier, or between wireless and land-line  
carriers. This new option will impose fewer burdens on consumers, and will help to  
minimize the demand by carriers to assign new telephone numbers.”

Thus, the El Segundo Chamber of Commerce respectfully requests and urges you to oppose  
portability postponement, because any further postponement of wireless local number portability  
(LNP) will negatively impact the urgent need for phone numbers in the 310 area code.

Most sincerely,

Daniel L. Ehrler  
Executive Director

May 28, 2003

The Honorable Michael K. Powell, Chairman, and Members  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: CC Docket 99-200 and CC Docket No. 96-98 in the matter of:  
Numbering Resource Optimization and Implementation of the Local Competition Provisions of  
the Telecommunications Act of 1996

Dear Chairman Powell and Commissioners:

On behalf of El Segundo Chamber of Commerce President Liz West and our Board of Directors, this communication is to communicate to you the Chamber's unanimous support for the California Public Utilities Commission's petition to raise the threshold on number contamination and respectfully and strongly urges you to do so.

This issue has been before the Chamber previously, and the Board's action was a reconfirmation of its prior position. The basis of this decision comes from a section of the *ALTERNATE DRAFT DECISION OF COMMISSIONER LYNCH*, from the California Public Utilities Commission, May 6, 2003, page 18. The following quote directly relates to the heart of our position and request:

“...the [PUC] Commission has requested the FCC to grant California the authority to increase the existing 10% ‘contamination’, or number use, threshold. Currently, carriers must donate to each area code’s common number pool all thousand-blocks of telephone numbers that contain less than 10% ‘contaminated’, or used, numbers. An increased level allowable contamination or usage rates for poolable thousand-number blocks (from current 10% to 25%) increases the number of thousand-blocks that are available to all carriers through each area code’s number pool. The Commission’s request for authority to implement this higher contamination rate has been pending at the FCC since September 2002. If granted, we estimate it would result in carriers returning approximately 260 additional thousand-blocks to the 310 area code number pool. Therefore, it is premature to order implementation to the 310/424 area code split until the FCC has acted on our request to implement this additional number conservation measure.” [The CA PUC’s request would] “... help increase the effectiveness of California’s area code number pools and prolong the life of the existing 310 area code.”

Thus, the El Segundo Chamber of Commerce respectfully requests and urges you to support the California Public Utilities Commission's petition to raise the threshold on number contamination and do so as soon as possible.

Most sincerely,

Daniel L. Ehrler, Executive Director